

GMDSS Task Force
1600 North Oak Street; #427
Arlington VA 22209

5 November 2006

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554**

In the Matter of)	
)	
Amendment of the Commission's Rules)	WT Docket No. 04-344
Regarding Maritime Automatic)	
Identification Systems)	
)	
Petition for Rule Making Filed by)	RM-10821
National Telecommunications and)	
Information Administration)	
)	
Emergency Petition for Declaratory)	
Ruling Filed by MariTEL, Inc.)	
)	
Amendment of the Commission's Rules)	PR Docket No. 92-257
Concerning Maritime Communications)	
)	
		September xx, 2006

**COMMENTS OF THE TASK FORCE FOR THE IMPLEMENTATION OF
THE
GLOBAL MARITIME DISTRESS AND SAFETY SYSTEM (GMDSS)**

The GMDSS Implementation Task Force respectfully submits these Comments in response to the Notice of Proposed Rulemaking published in the Federal Register on October 12, 2006 (71 FR 60102).

The GMDSS Task Force was chartered by the U.S. Coast Guard to supplement government functions through outreach to the private sector and recommendation to regulatory authorities. The Task Force membership is

broadbased including over 1500 representatives of commercial vessel operations, recreational boating interests, training institutions, service agents, manufacturers, and government authorities. The Task Force maintains a website at www.navcen.uscg.gov/marcomms which contains numerous GMDSS Information Bulletins, records of Task Force meetings, various letters and petitions seeking regulatory action, and comments to pending regulatory proceedings. Even though AIS is not technically a GMDSS system, the Task Force has taken the initiative to extend its areas of interest to include other maritime radio systems.

Satellite AIS – Inland Areas

The Task Force feels strongly that channels 87B and 88B should be reserved for exclusive AIS use not only in maritime VPCSA's, but also in all inland VPCSA's where navigable waterways exist. In narrow, obstructed, or winding waterways, AIS has the ability to "see" around islands and bends in rivers where radar can not reach, significantly improving navigational safety. Vessels should be able to use a seamless AIS system covering all navigable waterways. Channel 87B is needed for exclusive AIS use in all inland VPCSA's where navigable waterways exist, for the purposes of navigational safety.

The potential for satellite monitoring of AIS has been demonstrated, and is feasible. For this reason, channel 87B should be reserved for AIS purposes throughout all areas of the U.S.

AIS Base Stations

The Task Force feels that AIS base stations conforming to IEC 62320-1, should only be owned and operated by or on behalf of government agencies and port authorities responsible for waterway management. Private entities such as marinas and terminals could benefit from AIS information but this can be accomplished with receive-only AIS receivers, which are not base stations.

Class B AIS Shipborne Equipment

The Task Force supports the Commission's proposal to amend the Part 80 rules to incorporate by reference the IEC 62287-1 standard and provide for the certification of Class B AIS equipment that complies with that standard. Because of our experience with incorrect data being displayed by Class A units, the Commission should consider requiring persons that sell and install Class B AIS units to ensure that the appropriate static data is entered.

For the GMDSS Task Force

JACK FUECHSEL
Director, GMDSS Task Force
703-527-0484
gmdss@comcast.net